

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TIFFANY TOTH, GEMMA LEE, JESSA
HINTON, BROOKE TAYLOR, JESSE
GOLDEN, LINA POSADA, SHEENA LEE
WEBER, HEATHER RAE YOUNG, RACHEL
KOREN, SABELLA SHAKE, URSULA
MAYES, and CARMEN ELECTRA,

Plaintiffs,

- against -

59 MURRAY ENTERPRISES, INC., d/b/a
NEW YORK DOLLS GENTLEMEN'S CLUB,
BARRY LIPSITZ, AAM HOLDING
CORPORATION, d/b/a, PRIVATE EYES
GENTLEMEN'S CLUB, ANITA MICELI,
JAY-JAY CABARET, INC., d/b/a
FLASHDANCERS GENTLEMEN'S CLUB,
and MARSHA LIPSITZ,

Defendants.

Case No. 15-cv-8028 (NRB)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Plaintiffs' counsel, John V. Golaszewski, Esq., the exhibits thereto, the accompanying Memorandum of Law, the accompanying Local Rule 56.1 Statement of Undisputed Facts, and upon all other papers and prior proceedings hitherto had herein, Plaintiffs hereby respectfully move this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment in Plaintiffs' favor and against Defendants, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
June 1, 2018

THE CASAS LAW FIRM, P.C.

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